TFH/JRB: USAO 2017R00456

V.

DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT 10CT 30 PM 4: 32
FOR THE DISTRICT OF MARYLAND

\*

UNITED STATES OF AMERICA

CRIMINAL NO.

CARLOS DEANGELO BELL,

(Production of Child Pornography,

Defendant

18 U.S.C. § 2251(a); Forfeiture,

18 U.S.C. § 2253)

INDICTMENT

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# COUNT ONE (Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

#### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 1 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT TWO (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

#### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 2 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT THREE (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 3 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT FOUR (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

## CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 4 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT FIVE (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

#### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 5 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT SIX (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 6 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT SEVEN (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

#### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 7 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT EIGHT (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

## CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 8 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# COUNT NINE (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

#### CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 9 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

# <u>COUNT TEN</u> (Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

Between on or about January 1, 2014 and on or about December 22, 2016, in the District of Maryland and elsewhere, the Defendant,

## CARLOS DEANGELO BELL,

did knowingly employ, use, persuade, induce, entice, and coerce a minor – namely, Victim 10 – to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

### **FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

- 1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253 as a result of the defendant's convictions under Counts One through Ten of this Indictment.
- 2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in Counts One through Ten of this Indictment, in violation of Title 18, United States Code, Sections 2251, the defendant,

#### CARLOS DEANGELO BELL,

shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Section 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

### **Substitute Assets**

- 3. If any of the property described above, as a result of any act or omission of the defendant:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

18 U.S.C. § 2253

Stephen M. Schenning

Acting United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

10 30 2017 Date